

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
IN RE PHARMACEUTICAL INDUSTRY)	
AVERAGE WHOLESALE PRICE)	
LITIGATION)	MDL No. 1456
_____)	
)	Civil Action No. 01-12257-PBS
THIS DOCUMENT RELATES TO:)	
)	Judge Patti B. Saris
ALL CLASS ACTIONS)	
_____)	

**DECLARATION OF ADAM WRIGHT TRANSMITTING DOCUMENTS
REFERENCED IN TRACK ONE DEFENDANTS' MEMORANDUM IN SUPPORT OF
EMERGENCY MOTION TO DECLARE THE *TOUHY* REGULATION INAPPLICABLE
AND FOR LEAVE TO TAKE TRIAL DEPOSITIONS OF
CERTAIN FORMER GOVERNMENT EMPLOYEES**

I, ADAM WRIGHT, hereby declare:

1. I am a member of the bar of the Commonwealth of Massachusetts and of this Court. I am an associate with Ropes & Gray LLP, and counsel to Defendants Schering-Plough Corporation and Warrick Pharmaceuticals Corporation. I submit this Declaration to place before the Court documents referenced in Track One Defendants' Memorandum in Support of their Emergency Motion to Declare the *Touhy* Regulation Inapplicable and for Leave to Take Trial Depositions of Certain Former Government Employees.

2. Attached hereto as Exhibit A is a true and correct copy of a transcript of the hearing held before the Court on August 3, 2006.

3. Attached hereto as Exhibit B is a true and correct copy of a letter from John T. Montgomery to Gejaa T. Gobena and George B. Henderson, II, dated August 31, 2006.

4. Attached hereto as Exhibit C is a true and correct copy of a letter from George B. Henderson, II to John T. Montgomery, dated September 12, 2006.

5. Attached hereto as Exhibit D is a true and correct copy of a letter from John T. Montgomery to Mark B. McClellan and Daniel Meron, dated September 26, 2006, as well as related attachments.

6. Attached hereto as Exhibit E is a true and correct copy of a letter from John T. Montgomery to Gejaa T. Gobena and George B. Henderson, II, dated September 26, 2006.

7. Attached hereto as Exhibit F is a true and correct copy of a letter from Leslie V. Norwalk to John T. Montgomery, dated October 18, 2006.

I declare under penalty of perjury that the foregoing is true.

/s/ Adam Wright
Adam Wright

EXECUTED this 20th day of October in Boston, Massachusetts.

CERTIFICATE OF SERVICE

I hereby certify that on October 20, 2006, I caused a true and correct copy of the foregoing to be served on all counsel of record by electronic service pursuant to Case Management Order No. 2 entered by the Honorable Patti B. Saris in MDL 1456.

/s/ Adam Wright
Adam Wright